

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION,
INC.
and
CHARLES RIVER WATERSHED
ASSOCIATION, INC.

Plaintiffs,

v.

Case No. 22-11863

Michael S. REGAN, in his official capacity as
Administrator of the
U.S. Environmental Protection Agency,
David CASH, in his official capacity as
Regional Administrator for Region I of the
U.S. Environmental Protection Agency,
and
U.S. ENVIRONMENTAL PROTECTION
AGENCY,

Defendants.

ASSENTED-TO MOTION FOR EXTENSION OF TIME TO EFFECT SERVICE

Pursuant to Local Rule 4.1(b) and Fed. R. Civ. P. 6(b), Plaintiff Conservation Law Foundation, Inc. and Plaintiff Charles River Watershed Association, Inc. (collectively, “Plaintiffs”) respectfully submit this Assented-to Motion for a 45-day extension of the deadline for Plaintiffs to effect service on Defendants. The current deadline to effect service on Defendants is January 31, 2023. If granted by the Court, this motion would reset the deadline to effect service on Defendants to March 17, 2023. Plaintiffs have good cause for seeking an extension of time for service under Fed. R. Civ. P. 6(b), as they are in ongoing discussions with Defendants in an effort to resolve or narrow the issues in the above-captioned case. Additional facts supporting this motion are set forth pursuant

to Local Rule 4.1(b) in the Declaration of Attorney Heather A. Govern, attached hereto as **Exhibit A**.

Dated: January 26, 2023

Respectfully submitted,

CONSERVATION LAW FOUNDATION,
INC.

CHARLES RIVER WATERSHED
ASSOCIATION, INC.

By their attorneys:

/s/ Caitlin Peale Sloan

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CERTIFICATE PURSUANT TO LOCAL RULE 7.1(a)(2)

I, as counsel for Plaintiffs, hereby certify that I have conferred with counsel for all Defendants on this motion and that Defendants assent to the relief requested in this motion.

/s/ Heather A. Govern
Heather A. Govern

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2023, the foregoing document was filed through the ECF system, by which means a copy of the filing will be sent electronically to all Parties registered with the ECF system, and sent to Defendants' counsel by email.

/s/ Heather A. Govern
Heather A. Govern